

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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CONSUMER FINANCIAL PROTECTION  
BUREAU, et al.,

Plaintiffs,

v.

STRATFS, LLC (f/k/a STRATEGIC  
FINANCIAL SOLUTIONS, LLC) et al.

Defendants, and

DANIEL BLUMKIN, et al.,

Relief Defendants.  
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**MOTION ON BEHALF OF:**

**NOTICE OF MOTION SEEKING  
NON-OBJECTION TO  
WITHDRAWAL**

Civil Action No. 24-CV-40-EAW-MJR

Intervenor Defendants, ANCHOR LAW FIRM, PLLC, BEDROCK LEGAL GROUP, BOULDER LEGAL GROUP, BRANDON ELLIS LAW FIRM LLC, CANYON LEGAL GROUP LLC, CHINN LEGAL GROUP, LLC, CLEAR CREEK LEGAL, LLC, CREDIT ADVOCATES LAW FIRM LLC, GREAT LAKES LAW FIRM LLC, GREENSTONE LEGAL GROUP, GUSTAFSON CONSUMER LAW GROUP, LLC, HALLOCK AND ASSOCIATES, HALLOCK & ASSOCIATES LLC, HARBOR LEGAL GROUP, HEATLAND LEGAL GROUP, LEIGH LEGAL GROUP, PLLC, LEVEL ONE LAW, MEADOWBROOK LEGAL GROUP, MICHEL LAW LLC, MONARCH LEGAL GROUP, MOORE LEGAL GROUP, LLC, NEWPORT LEGAL GROUP LLC, NORTHSTAR LEGAL GROUP LLC, OPTION 1 LEGAL, PIONEER LAW FIRM P.C., ROCKWELL LEGAL GROUP, SLATE

LEGAL GROUP, SPRING LEGAL GROUP, STONEPOINT LEGAL GROUP, THE LAW FIRM OF DEREK WILLIAMS LLC, THE LAW OFFICE OF MELISSA MICHEL LLC, WHITESTONE LEGAL GROUP, AND WYOLAW LLC  
by and through their attorneys,  
CONNORS LLP.

**DATE, TIME, AND PLACE  
OF MOTION:**

To be determined by this Court, before the Hon. Michael J. Roemer, United States District Court Judge, Robert H. Jackson United States Courthouse, 2 Niagara Square, Buffalo, New York 14202.

Oral argument is requested.

**RELIEF REQUESTED:**

An Order of this Court allowing Intervenor Law Firms' withdrawal from representing their current clients.

**GROUND FOR  
RELIEF REQUESTED:**

Preliminary Injunction, Docket Item 184, and all prior pleadings and proceedings.

**SUPPORTING PAPERS:**

Declaration of James Agosto, dated October 25, 2024; Declaration of Tim Burnette, dated October 25, 2024; Declaration of Jerome Dubin, dated October 25, 2024; Declaration of Richard K. Gustafson, II, dated October 25, 2024; Declaration of Michelle Hinds Gallagher, dated October 25, 2024; Declaration of Craig Horvath, dated October 25, 2024; Declaration of Lori Leigh, dated October 25, 2024; Declaration of Guillermo Geisse, dated October 25, 2024; Declaration of Thomas Rogus, dated October 25, 2024; Memorandum of Law in Support and Draft Termination Letter.

Movants intend to submit reply papers.

DATED: Buffalo, New York  
October 25, 2024

/s/ Terrence M. Connors

Terrence M. Connors, Esq.

Andrew M. Debbins, Esq.

CONNORS LLP

*Attorneys for Intervenor Defendants*

1000 Liberty Building

Buffalo, New York 14202

(716) 852-5533

tmc@connorsllp.com

amd@connorsllp.com

Timothy D. Elliot, Esq.

Emily Shupe, Esq.

Rathje Woodward LLC

300 E. Roosevelt Road

Suite 220

Wheaton, Illinois 60187

(630) 510-4910

telliott@rathjelaw.com

eshupe@rathjelaw.com

TO: All Parties of Record (via CM/ECF)